



STATE OF TENNESSEE
DEPARTMENT OF ENVIRONMENT AND CONSERVATION
DIVISION OF WATER RESOURCES

William R. Snodgrass - Tennessee Tower
312 Rosa L. Parks Avenue, 11th Floor
Nashville, Tennessee 37243-1102

June 9, 2016

Mr. Michael Hunt
Metro Water Services
Stormwater Division – NPDES
1607A County Hospital Rd.
Nashville, TN 37218


Re: MS4 Permit Visual Stream Assessment Modification Approval
NPDES Permit No. TNS068047

Dear Mr. Hunt,

Per your request, we have reviewed your attached proposal to modify the non-analytical monitoring requirements of your MS4 permit. We understand the difficulty of performing your visual stream assessment protocol on the listed portion of the Cheatham Reservoir (Cumberland River) due to its size and configuration, and believe the activities described in your proposal would be reasonable alternatives. As such, please except this correspondence as our approval to modify your non-analytical monitoring accordingly.

Thank you, and please let me know if you have any questions.

Sincerely,



Robert Karesh
Statewide Stormwater Coordinator
Department of Environment and Conservation
Division of Water Resources

Attachment: MS4 Permit Visual Stream Assessment Proposed Modification Request

cc: Erin O'Brien - Nashville EFO
Permit Section File - TNR100000

uploaded by
wmurphy or
Erin O'Brien



METROPOLITAN GOVERNMENT OF NASHVILLE AND DAVIDSON COUNTY

DEPARTMENT OF WATER AND SEWERAGE SERVICES

Stormwater Division - NPDES
1607A County Hospital Road
Nashville, Tennessee 37218

May 24, 2016

Mr. Robert Karesh
Tennessee Department of Environment and Conservation
Division of Water Resources
William R. Snodgrass Tennessee Tower
312 Rosa L. Parks Blvd
Nashville, TN 37243

TN DEPT OF ENVIRONMENT
AND CONSERVATION
MAY 25 2016
DIV OF WATER RESOURCES
RECEIVED

Subject: **MS4 Permit Visual Stream Assessment Proposed Modifications**
NPDES Permit No. TNS068047

Dear Mr. Karesh:

We are requesting a minor program modification to our MS4 Permit's Non-analytical monitoring, Section 4.2. The Cheatham Reservoir (aka Cumberland River) is considered impaired for pathogens on 994 acres or approximately 5.2 river miles. Due to the size and configuration of the river, it would be extremely difficult to follow our visual stream assessment protocol. There are other existing Metro and NPDES Office programs in place that serve to monitor activities and pathogen levels on the Cumberland River, and we request these serve as replacement for the aforementioned visual stream assessment requirement for the listed portion of Cheatham Reservoir.

First, as part of the Central WWTP permit, Metro Water Services Pretreatment Section Staff monitor *E. coli* levels on the river weekly at 2 locations on the Cumberland River at the Omohundro Water Treatment plant and also just downstream of the Clarksville Pike Roadway Bridge. During their sample collections, they also look for any outfalls of concern. If outfall concerns are identified, they notify NPDES Office staff to investigate. Periodically every year or so, NPDES Office staff accompany Pretreatment Section staff to conduct a "river run" via boat and look at each outfall on the river and perform sampling if the outfall discharge or surroundings evidence concern. Additionally, as part of our ongoing Thermograph program, the entire length of the Davidson County Portion of the Cumberland River was flown in 2015 and 4 sites were identified to investigate - none of which were found to be illicit discharges. This segment of the Cumberland River will continue to be flown as part of this program in future Thermograph flights and any identified outfall issues investigated.

If you have any questions, we would be happy to discuss or please feel free to call 615-880-2420.

Sincerely,

Michael Hunt
MWS Stormwater, NPDES Program Manager

cc: Erin O'Brien- TDEC, Division of Water Pollution Control-Nashville Environmental Field Office
Tom Palko- MWS Asst. Director Stormwater
Josh Hayes - MWS NPDES Program
Mary Bruce - MWS NPDES Program